

MIRANDA SLONE SKLARIN VERVENIOTIS LLP

MICHAEL A. MIRANDA*
STEVEN VERVENIOTIS
ONDINE SLONE
RICHARD S. SKLARIN°
MAURIZIO SAVOIARDO
ANDREW B. KAUFMAN±
LAWRENCE S. WASSERMAN*
LOUISE FASANO
LAURA ALTO

*ALSO ADMITTED IN NEW JERSEY ±ALSO ADMITTED IN DISTRICT OF COLUMBIA ° RESIDENT IN WESTCHESTER

WRITER'S E-MAIL: <u>SVERVENIOTIS@MSSSV.COM</u>

WRITER'S DIRECT DIAL: 516-741-8488

Via ECF

Judge Kiyo A. Matsumoto United States District Court Eastern District of New York 225 Cadman Plaza East Courtroom 6C South Brooklyn, New York 11201 THE ESPOSITO BUILDING 240 MINEOLA BOULEVARD MINEOLA, NY 11501 TEL (516) 741-7676 FAX (516) 741-9060

WWW.MSSSV.COM

BRANCH OFFICES: WESTCHESTER, NY NEW YORK, NY WOODBRIDGE, NJ

February 14, 2025

SENIOR COUNSEL ABRAHAM WARMBRAND GABRIELLA CAMPIGLIA KENNETH MASTELLONE°

ASSOCIATES
RICHARD B. EPSTEIN
BRANDON H. DORMAN
WALDER THAME-TURNER

Re: Falls Lake Nat'l Ins. Co.v. Kalnitech Constr. Corp. et. al.

Docket No: 1:22-cv-01473-KAM-PK

Our File No: 19-208

Dear Judge Matsumoto:

Pursuant to Your Honor's Order dated February 13, 2025, submitted herein please find the complete deposition transcripts of the following witnesses:

- 1. David Kleeman dated April 5, 2023;
- 2. Kostas Stoupakis dated May 11, 2022;
- 3. Stalin Rodrigo Reyes Espinoza dated November 17, 2021 and March 24, 2022; and
- 4. Dwayne Hudson dated April 11, 2022.

Respectfully submitted,
MIRANDA SLONE SKLARIN VERVENIOTIS LLP

s/Steven Verveniotis

Steven Verveniotis

cc: All counsel of record